

October 4, 2011



United States Environmental Protection Agency (USEPA)
Air Compliance Data-Michigan
Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604

RE: *Resubmittal* Semi-Annual POWC-MACT Reports
Resubmittal Renewable Operating Permit No. MI-ROP-A6220-2009

To whom it may concern:

Pursuant to 40 CFR 63.3400(c), Subpart JJJJ, Intertape Polymer Group (IPG) is submitting the enclosed Semi-annual Compliance Report for the reporting period January 1, 2011 through June 30, 2011.

The enclosed Semi-annual Compliance Report is being resubmitted to you, to correct the error indicating that we had air emissions outside of the permitted operating limits. This is not correct. We have not deviated from the standard and continue to operate in compliance.

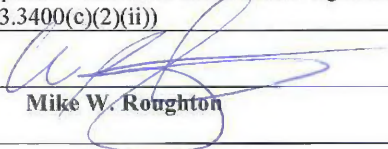
Please note that IPG works diligently to comply with all applicable regulations and permit limitations. If you have any questions or require further details, do not hesitate to contact me at (810) 941-6370

Sincerely,

Mike W. Roughton
Operations Manager
Intertape Polymer Group

Enclosures: Semiannual Compliance Report

CC: IPG File

| Paper and Other Web Coating Industry – 40 CFR Part 63, Subpart JJJJ Semiannual Compliance Report – Emission Monitoring System Performance (63.3400(c)) | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company Name: Central Products Company d.b.a. Intertape Polymer Group | | Beginning date of reporting period: 01/01/2011 | |
| Ending date of reporting period: 06/30/2011 | | | |
| Name of Affected Source: Intertape Polymer Group | | Address of Affected Source: 317 Kendall Avenue, Marysville, MI 48040 | |
| Person to Contact Regarding Submittal: Mike W. Roughton | | Mailing Address: 317 Kendall Avenue, Marysville, MI 48040 | |
| Telephone No: 810-941-6370 | | | |
| Brief description of process units: Line 1, Line 3, Line 4 and Pilot Coater are coating lines manufacturing pressure sensitive tape. | | Total operating time of affected source during reporting period: 4344 Hours | |
| Identification of each hazardous air pollutant monitored at the affected source: 40 CFR Part 63 Subpart JJJJ regulates all organic hazardous air pollutant (HAP) emissions as a whole and does not regulate specific HAPs on an individual basis. Therefore, the identification of each hazardous air pollutant monitored at the affected source, as required by §63.10(e)(3)(vi) is the entire list of all of the organic HAP's. (Section 112(b)(1)) | | | |
| Name, Title and Signature of Responsible Official Who is Certifying Accuracy of Report: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (63.3400(c)(2)(ii)) | | | |
| Signature:  | | | Date of report: 9/30/11 |
| Printed Name: Mike W. Roughton | | Title: Operations Manager | |
| Deviations of Criteria ⁴ | | | |
| Criteria Reviewed | Emission and operating parameter limitations specified in the relevant standard(s) for existing sources | Has standard been deviated from? The following character may used for convenience: <input checked="" type="checkbox"/> | Method of Compliance Determination. Check which applies. Only check if the relevant standard has been deviated from, then continue to next page. The following character may used for convenience: <input checked="" type="checkbox"/> |
| §63.3370 ⁵ (Check all compliance methods used) | Standard for Paper and Other Web Coating Facility ⁶ | | |
| §63.3370(c) <input type="checkbox"/> Permit Condition ⁷ : | Capture and control overall organic HAP emissions by 95%, or limit outlet organic HAP concentration < 20 ppmv by compound on a dry basis | <input type="checkbox"/> Yes <input type="checkbox"/> No | Continuous Parameter Monitoring System <input type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input type="checkbox"/> |
| §63.3370(f) <input checked="" type="checkbox"/> Permit Condition: F-1.1-II-(1)(3)(c) | Capture and control emissions to <0.2 kg organic HAP/kg solids as applied | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Continuous Parameter Monitoring System <input checked="" type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input checked="" type="checkbox"/> |
| §63.3370(g) <input type="checkbox"/> Permit Condition: | Capture and control emissions to <0.04 kg organic HAP/kg coating material applied | <input type="checkbox"/> Yes <input type="checkbox"/> No | Continuous Parameter Monitoring System <input type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input type="checkbox"/> |
| §63.3370(h) <input type="checkbox"/> Permit Condition: | Capture and control emissions to achieve allowable emissions rate calculated equivalent allowable organic HAP per §63.3370(l) | <input type="checkbox"/> Yes <input type="checkbox"/> No | Continuous Parameter Monitoring System <input type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input type="checkbox"/> |

⁴ If no exceedances or deviations occurred, complete only page 1 and submit to the appropriate agencies.

⁵ Note that multiple compliance methods may be used during the six-month period. If more than one method was used, identify in the box the month(s) when each particular compliance method was used. For reporting due dates, see the POWC Timeline.

⁶ A brief description of each potential compliance method (§63.3370(e) - (h)) is included. Please refer to the Standard for detailed descriptions of each method of compliance.

⁷ For Title V sources, enter the appropriate permit condition number